

1 Thomas C. Horne
2 Attorney General
3 Michael E. Gottfried, Bar No. 010623
4 Lucy M. Rand, Bar No. 026919
5 Assistant Attorneys General
6 1275 W. Washington Street
7 Phoenix, Arizona 85007-2926
8 Telephone: (602) 542-1610
9 Fax: (602) 542-7670
10 E-mail: Michael.Gottfried@azag.gov
Lucy.Rand@azag.gov

11 *Attorneys for Defendants*

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF ARIZONA**

14 Kini M. Seawright; *et al.*,
15 Plaintiff,
16 v.
17 State of Arizona; *et al.*,
18 Defendants.

19 No. CV11-01304-PHX-JAT

20 **DEFENDANTS' MOTION TO SEAL
EXHIBITS TO DEFENDANTS'
STATEMENT OF FACTS IN SUPPORT
OF SUMMARY JUDGMENT MOTION**

21 Defendants¹, through undersigned counsel, pursuant to LRCiv 5.6, move this
22 Court for an order directing the Clerk of the Court to file under seal the following
23 attachments to Exhibits to Defendants' Separate Statement of Facts in support of
24 summary judgment motion that were lodged under seal in conjunction with Defendants'
25 statement of facts in support of Defendants' summary-judgment motion.

26 1. Exhibit B, Declaration of Keith Smith:

27 Attachment 1: Aerial Photograph of Arizona State Prison Complex
28 ("ASPC")-Lewis;

Attachment 2: Aerial Photograph of ASPC-Lewis-Stiner Unit;

Attachment 3: Floor Diagram of ASPC-Lewis-Stiner Unit, inmate Dorm 2;

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1 Attachment 5: ASPC-Lewis Staffing Numbers and Cross-Leveling Chart
2 Attachment 6: ASPC-Lewis-Stiner Unit Post Priority Collapse Chart

3 2. Exhibit C, Declaration of Edna Jackson-Bey:

4 Attachment 1: Floor Diagram of ASPC-Lewis-Stiner Unit, inmate Dorm 2;

5 Attachment 2: Post Order PO-054-STI, Housing Unit Security Officer.

6 Defendants have a compelling governmental interest in keeping these documents
7 sealed. These exhibits contain security information about ASPC-Lewis' prison layout
8 and prison procedures that, if revealed, would create a security concern and could
9 endanger the inmates, the prison staff, other law enforcement officers, and the general
10 public.

11 For the foregoing reasons, Defendants respectfully request that the Court order
12 the Clerk of the Court to file under seal Defendants' Attachments 1, 2, 3, 5 and 6 to
13 Exhibit B and Attachments 1 and 2 to Exhibit C to the Separate Statement of Facts in
14 Support of Summary Judgment Motion, lodged under seal.

15 RESPECTFULLY SUBMITTED this 28th day of February, 2013.

16 Thomas C. Horne
17 Attorney General

18 s/Michael E. Gottfried _____
19 Michael E. Gottfried
20 Lucy M. Rand
Assistant Attorneys General
Attorneys for Defendants

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22
23 **CERTIFICATE OF SERVICE**

24 I hereby certify that on February 28, 2013, I electronically transmitted the
25 attached document to the Clerk of the Court using the ECF System. This document and
26 the Notice of Electronic Filing were automatically served on the same date to the
27 following, who are registered participants of the CM/ECF System:
28

1 DeeAn Gillespie, Esq.
2 Amy Wallace, Esq.
3 GILLESPIE, SHIELDS & DURRANT
4 7319 North Sixteenth Street, #100
5 Phoenix, Arizona 85020-5262
6 *Attorneys for Plaintiff*

7 s/Lucy M. Rand

8 Lucy M. Rand

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